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Dear Ms. Saare- Edmonds

This letter is to voice my concern and objection to the proposed changes in the MWEL0 legislation. I feel that these changes will be extremely detrimental to the landscape and irrigation industry. More importantly they will not achieve their intended purpose.

You can only manage what you measure and except by gross means agriculture, the largest user of water in the state, is unregulated. This is only one of the issues this industry and you, as our advocate, must address.

As a landscape irrigation and water conservation professional with 30 years of landscape maintenance experience to draw upon. I have done audits encompassing the entire spectrum of facilities; residential, commercial, industrial, institutional, city and county properties. My general summary is that maintenance and assessment of irrigation system performance and the the training of personnel have been at the bottom of everyone's list, if it is there at all.

I recently completed an audit of Rossmoor Community here in southern California. The properties I audited are maintained by Valley Crest Landscape. The largest landscape maintenance company in America with worldwide reach. Among their portfolio of clients are The Getty Center and the Bellagio Las Vegas. They failed in spades. It took me three days to audit these sites. They allow 8 hours a week for maintenance and repair of the irrigation system. I would gladly share this report with you. We have a water crisis because nobody is minding the store.

Another example. I live in the city of Buena Park and until 4 years ago they were still using hydraulic controllers. When was the last time you or your staff were forced to use a typewriter or abacus to perform your duties?

To the issue of of the current MWEL0, they have recently done renovations to various irrigation systems throughout the city. NONE of which are in compliance with the current MWEL0 guidelines. One prominent example near my home is a curb strip 5'6" wide, irrigated with Rain Bird 1806 pop-ups with a 8' H nozzle and the soil grade is above the height of the cement curb. I was told that both the Parks and Recreations Supervisor and the Landscape Architect consider this system in compliance. Through a concerted effort I was eventually able to talk you to regarding this issue and you admitted that there was nothing your office could do. How does changing the rules without including penalties make them any more effective?

The city of Buena Park is not the only public or private offender. I could show you recent installation or renovation throughout the area all with the same issues.

Now the state is in crisis and they purpose to violate tenant number 4 of the very code they established. Healthy landscapes produce the air we breath. Provide an ecosystem that cleans our water, sequesters GHG, sequesters toxins in the soil, provides habitat for fauna, and

provides psychological and emotional benefits to underserved individuals in urban communities. These new regulations will severely affect all these benefits.

In addition, by fiat, the state is proposing the abolition of turf grass for most residential developments. You are also outlawing all forms of spray irrigation. In effect imposing the states will over the free market. This process has a name, socialism. Once again the urban population is asked to sacrifice. While the largest user and abuser of water, agriculture, is allowed to operate with little or no oversight or penalty. Unless self imposed by switching crops or reducing acreage.

There is no one solution to resolving the water issue throughout the the world. Every possibility must be considered. In my opinion this is not one of them. This will not only destroy our urban ecosystem but will destroy businesses and put people out of work.

This is not a solution. This is caving into hysteria and pressure to provide a quick solution. It took us 165 years to create the problem.

RIGHT NOW. I can offer you 6 proven free market solutions that can get us over the 28% reduction goal with ease.

Conclusion:

The new MWELO is flawed in many ways. The existing MWELO has changed the face of landscape and irrigation in California. It has set a standard that those with skill and training can achieve with ease. The current ordinance is severing its intended purpose. With one fatal flaw. This flaw lets the bad actors to operate with impunity as will the new one. Creating a new regulation with the same fatal flaw only affects those who are your allies. Fix the flaw.

Thank you for taking the time to consider the impact the revised MWELO will have on the landscape and irrigation industry. I would be interested to hear about your intended response / actions.

Sincerely,
Joe Frisbie
Energy and Water Conservationist